REMARKS

I.   Examiner Interview

Applicants' attorney appreciates the Examiner's courtesy in speaking with him on May 7, 2008, regarding the outstanding final office action. The interview included discussion of the § 103 rejection of claim 42 made by the Examiner. Applicants submit that the comments below reflect the substance of the interview.

II.   Status

Claims 42-43 and 59 have been amended, and claims 60-75 have been added. No new matter has been added as a result. Claims 1-41 have been previously canceled. Accordingly, claims 42-75 are currently pending.

III.   Rejections Under 35 U.S.C. § 103

Claims 42-46, 48-49, 51-53, 55-56, and 58-59 were rejected under 35 U.S.C. §103(a) as being unpatentable over Graf, et al. (U.S. 4,645,459) in view of Lechner (U.S. 2003/0059743).

Claim 42 and Dependents

Claim 42 recites, *inter alia*, "producing, by a map developer, a source geographic database containing data representing a real-world locale" and "transforming, by the map developer, the data representing the real-world locale into data representing an imaginary geographic locale to form a template geographic database." The combination of the cited references does not teach or suggest at least these features.

Graf, et al. disclose a computer generated synthesized imagery ("CGSI") system that allows a scene to be constructed by placing high fidelity objects on a specified surface or background. (Graf, et al., column 2, lines 50-60). The system is used for generating simulator gaming areas, which may be fictitious. (Graf, et al., column 4, lines 40-50). The system uses an object library, which normally comprises photographic matter, to store images from individual real-world elements for use in generating a gaming area. (Graf, et al., column 6, lines 53-57).

Lechner discloses automatically generating a terrain model for display during a simulated flight along a predefined mission route. (Lechner, Abstract). The Background section of Lechner discloses a terrain model designer generating a

terrain model for display during flight simulation. (Lechner, paragraphs [0001] and [0003]). The terrain model designer may obtain terrain source data from electronic collections of terrain data that may be available from, for example, the Joint Services Imaging Processing Station, the Gateway Data Navigator, or the United States Imagery and Geospatial Information Services. (Lechner, paragraphs [0006]-[0007]).

However, the combination of Graf, et al. and Lechner does not teach or suggest **transforming** data representing a **real-world locale** *into* data representing an **imaginary geographic locale**. Graf, et al. disclose a fictitious battlefield area as a gaming area, but that is not the same as converting or transforming a real-world locale into an imaginary locale. The developers in Graf, et al. may create a fictitious world by picking and choosing some real-world images, but there is no teaching or suggestion of starting with a real-world locale and transforming that real-world locale into an imaginary geographic locale.

Furthermore, there is no teaching or suggestion of transforming the real world locale into an imaginary geographic locale **by a map developer**. Both Graf, et al. and Lechner disclose simulator designers, and, therefore, the generation of any alleged imaginary geographic locale would be by a simulator designer, not a map developer. Lechner mentions a terrain model designer that obtains data to construct a terrain model for simulated flights, but the terrain model designer is not a map developer. The terrain model designer **obtains** terrain source data **from** electronic collections.

Additionally, the combination of Graf, et al. and Lechner does not teach or suggest a **template** geographic database. The Examiner asserts that the Office considers the limitation of providing a template database as obvious because people or businesses generally like to pay for what they need. (Office Action, page 3). However, obtaining or paying for some data is not the same as a map developer generating a template.

Accordingly, claim 42 is allowable for at least these reasons. Claims 43-58 depend, directly or indirectly, from allowable claim 42 and, therefore, are allowable for at least the same reasons.

Claim 59

Claim 59 recites features similar to the features of claim 42 described above. The arguments made in regards to claim 42 appropriately apply to claim 59 as well. Furthermore, claim 59 recites, *inter alia*, "producing, by a map developer, a source geographic database containing data representing a real-world locale including a road network, wherein the data representing the real-world locale include attributes suitable for providing navigation-related functions for the road network." The combination of the cited references does not teach or suggest at least these features.

Graf, et al. disclose using a road and road surfaces when placing objects in a gaming area (Graf, et al., column 5, line 50 and column 10, lines 22-23), and Lechner discloses electronic collections of terrain source data. (Lechner, paragraph [0007]). However, a real-world image or picture of a terrain or a road is not the same as a source geographic database that contains data representing a real world road network in which the data include **attributes** suitable for providing **navigation-related functions for the road network**. For example, images and data disclosed by Graf, et al. and Lechner may not contain attributes, such as turn restrictions, address and street name information, and other navigation attributes, that can be used to guide or navigate one through a real-world road network. There is no teaching or suggestion that the information or images disclosed by Graf, et al. and Lechner would allow for providing navigation related functions, such as route calculation, route guidance, or vehicle positioning.

Accordingly, claim 59 is allowable for at least these reasons.

Claims 47, 50, 54, and 57 were rejected under 35 U.S.C. §103(a) as being unpatentable over Graf, et al. in view of Lechner and in further view of Huston, et al. (U.S. 6,146,143).

Claims 47, 50, 54, and 57 depend, directly or indirectly, from allowable claim 42 and, therefore, are allowable for at least the same reasons as discussed above.

Furthermore, one or more of the dependent claims recite features that are independently allowable. For example, claim 43 recites, *inter alia*, "wherein the source geographic database comprises attributes suitable for providing navigation-

related functions for a real-world road network." The cited references mention real-world images of roads and road surfaces as well as terrain source data, but that is not the same as a database that has **attributes** suitable for **providing navigation-related functions for a real-world road network**.

Claims 54-57 recite, *inter alia*, combining road model data or 3D model data with data in a template geographic database by a map developer. The cited references do not teach or suggest these features. The generation of simulator gaming areas by simulator designers is not the same as **combining road model data or 3D model data** with data in a template geographic database **by a map developer**.

Claim 58 recites, *inter alia*, "insuring, by the map developer, data integrity in the template geographic database, wherein insuring data integrity comprises checking road connectivity." Graf, et al., column 10, lines 10-23 disclose that reference points are used to place an object in a gaming area by a simulator designer. However, there is no teaching or suggestion of **insuring or checking road connectivity by a map developer** in a template geographic database that corresponds to an **imaginary geographic locale**.

New Claims 60-75

Claims 60-75 recite features that are not taught or suggested by the cited references. Accordingly, claims 60-75 are allowable.

IV.   Summary

It is respectfully asserted that all of the pending claims are patentable over the cited references, and allowance of the pending claims is earnestly solicited. If the Examiner believes that a telephone interview would be helpful in resolving any outstanding issues, the Examiner is respectfully invited to contact the undersigned at the telephone number listed below.

Respectfully submitted,

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